



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SLR:KAN:JHK

*610 Federal Plaza, 5<sup>th</sup> Floor  
Central Islip, New York 11722*

October 15, 2010

**VIA ELECTRONIC FILING**

Kenneth W. Ravenell, Esq.  
The Murphy Firm  
One south Street, 23<sup>rd</sup> Floor  
Baltimore, Maryland 21202

Re: United States v. Brooks, et al.  
Criminal Action No. 06 CR 0550 (S-1) (Seybert, J.)

Dear Mr. Ravenell:

This undersigned Assistant United States Attorneys represent the United States with respect to the forfeiture issues in the above prosecution against defendants Sandra Hatfield ("Hatfield") and David H. Brooks ("Brooks"). This letter is submitted in response to Brooks' letters dated October 9 and October 11, 2010, seeking limited additional discovery concerning the work performed by Professor Larry Harris in this case. See Docket Entry Nos. 1353 and 1354.

First, please be advised that Professor Harris has no disqualifying conflict so as to preclude his testimony in the forfeiture phase of this case. Contrary to Brooks' surmise, the government did not engage or retain Charles River Associates ("CRA") in connection with this case. CRA personnel did not conduct any analyses or perform any services for either the government or Professor Harris in connection with this case. Thus, Professor Harris did not submit any bills or invoices to CRA, and the government did not pay to any fees to CRA, in connection with this case. Therefore, the bulk of the limited discovery Brooks requested does not exist.

The government did, however, retain National Economic Research Associates, Inc. ("NERA"). NERA worked with Professor

-2-

Harris in preparation for his expert testimony and provided other services to the government unrelated to Professor Harris' analysis and testimony. Without waiving any privilege, the government will produce copies of its engagement letters and the invoices submitted under separate cover.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: s/ James H. Knapp  
James H. Knapp  
Kathleen A. Nandan  
Assistant U.S. Attorneys  
(631) 715-7879

To: **Via ECF**  
Honorable Joanna Seybert  
United States District Judge  
Eastern District of New York  
  
Roland Riopelle, Esq.  
Sercarz & Riopelle, LLP  
Counsel for Sandra Hatfield